

United States Courts
Southern District of Texas

FILED

IN THE UNITED STATES DISTRICT COURT FOR THE *October 27, 2020*
NORTHERN DISTRICT OF WEST VIRGINIA

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA,

v.

ANTHONY ALLEN,
JOHNNIE BRADLEY,
MICHAEL ALCENDOR,
JAMES PUGH,

JEFFREY HOWARD,
KEDRICK HOWARD,
LEONARD JASMINE,

SIXTO MARQUEZ,
FRANCISCO CHANES,
AALIYAH SNOWDEN,
RODERICK BRADLEY,

KELSEY MCCLUNG,
ROBERT WOODY,
TIFFANY GROVES,
SABRINA BURTON,
SKILOR PERDUE,
LOREN DELANEY,
GREG SNIDER,
MORGAN JANES,
SUZANNE ADIYEH,
ANTONIO BUZZO,
DAVID GAMBLE,
LESLIE O'QUINN,
NARKEVIA LEWIS, and
ASHLEY JOHNSON,

Defendants.

Unsealed p/Order 10/20/20

FILED

OCT 20 2020

U.S. DISTRICT COURT
ELKINS WV 26241

4:20-MJ-2110

Criminal No.

1:20cr74

Judge Thomas S. Kleeh

MJM. J. Aloï

Violations:

18 U.S.C. § 2
18 U.S.C. § 1956(a)(1)(A)(i)
18 U.S.C. § 1956(h)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)(1)
21 U.S.C. § 846
21 U.S.C. § 856(a)(2)
21 U.S.C. § 860

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Distribute Controlled Substances)

From in or about the Spring of 2018, to on or about the return of this Indictment, in Monongalia County, in the Northern District of West Virginia, and elsewhere, defendants **ANTHONY ALLEN, JOHNNIE BRADLEY, MICHAEL ALCENDOR, JAMES PUGH, JEFFREY HOWARD, KEDRICK HOWARD, LEONARD JASMINE, SIXTO MARQUEZ, FRANCISCO CHANES, AALIYAH SNOWDEN, RODERICK BRADLEY, KELSEY MCCLUNG, ROBERT WOODY, TIFFANY GROVES, SABRINA BURTON, SKILOR PERDUE, LOREN DELANEY, GREG SNIDER, MORGAN JANES, SUZANNE ADIYEH, ANTONIO BUZZO, DAVID GAMBLE, LESLIE O'QUINN, NARKEVIA LEWIS, and ASHLEY JOHNSON**, and others, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute, and to distribute methamphetamine, cocaine base, also known as "crack," cocaine hydrochloride, also known as "coke, and fentanyl, all Schedule II narcotic controlled substances, and heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Section 841(b)(1)(C).

OVERT ACTS

In furtherance of the conspiracy and to achieve the objects thereof, the defendants and others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts in the Northern District of West Virginia and elsewhere:

1. On April 18, 2020, **ANTHONY ALLEN**, who was in the Northern District of West Virginia, arranged with **SIXTO MARQUEZ** over a telephone to purchase a controlled substance. **ANTHONY ALLEN** arranged with **SIXTO MARQUEZ** for **FRANCISCO CHANES** to obtain the narcotics from **SIXTO MARQUEZ**.

2. On May 11, 2020, **ANTHONY ALLEN**, who was in the Northern District of West Virginia, communicated with **SIXTO MARQUEZ** over a telephone to arrange a purchase of narcotics. **SIXTO MARQUEZ** was in the process of obtaining the narcotics for distribution and agreed with **ANTHONY ALLEN** to distribute the narcotics to **FRANCISCO CHANES** for **ANTHONY ALLEN**.
3. In April 2020, **FRANCISCO CHANES** shipped through the United States mail a quantity of narcotics to **ANTHONY ALLEN** in the Northern District of West Virginia.
4. In June 2020, **FRANCISCO CHANES** shipped through the United States mail a quantity of narcotics to **ANTHONY ALLEN** in Houston, Texas.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

(Money Laundering Conspiracy)

From in or about August of 2019, and continuing to June of 2020, in Monongalia County, in the Northern District of West Virginia, and elsewhere, the defendants **ANTHONY ALLEN and SKILOR PERDUE** did knowingly and intentionally combine, conspire, and confederate and agree with each other, to violate Title 18, United States Code, Section 1956(a)(1)(A)(i) by conducting financial transactions involving the proceeds of a specified unlawful activity, that is the distribution of methamphetamine, cocaine base, also known as “crack,” cocaine hydrochloride, also known as “coke,” fentanyl, and heroin, in violation of Title 21, United States Code, Section 841(a)(1), with the intent that the financial transactions which affected interstate commerce, would promote the carrying on of said specified unlawful activity; all in violation of Title 18, United States Code, Sections 1956(h) and (a)(1)(A)(i).

COUNT THREE

(Possession with Intent to Distribute Heroin)

On or about September 6, 2019, in Monongalia County, in the Northern District of West Virginia, defendant **JEFFERY HOWARD**, did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Possession with Intent to Distribute Cocaine Base)

On or about September 6, 2019, in Monongalia County, in the Northern District of West Virginia, defendant **JEFFERY HOWARD**, did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Possession with Intent to Distribute Methamphetamine)

On or about September 6, 2019, in Monongalia County, in the Northern District of West Virginia, defendant **JEFFERY HOWARD**, did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Aiding and Abetting Distribution of Fentanyl)

On or about January 8, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **KELSEY MCCLUNG and ANTONIO BUZZO**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$240.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Distribution of Fentanyl)

On or about January 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **ANTONIO BUZZO**, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$120.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Aiding and Abetting Distribution of Heroin)

On or about January 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **JOHNNIE BRADLEY and KELSEY MCCLUNG**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINE

(Distribution of Fentanyl)

On or about January 23, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **JAMES PUGH**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

(Distribution of Fentanyl)

On or about January 27, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **MICHAEL ALCENDOR**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$80.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Aiding and Abetting Distribution of Heroin)

On or about January 28, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **JOHNNIE BRADLEY and MORGAN JANES**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

(Distribution of Cocaine Base)

On or about February 13, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **KELSEY MCCLUNG**, did unlawfully, knowingly, intentionally and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for \$80.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Distribution of Heroin)

On or about February 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **JOHNNIE BRADLEY**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for \$100.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Distribution of Fentanyl)

On or about February 19, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **MORGAN JANES**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$60.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Distribution of Cocaine Base)

On or about February 20, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **MORGAN JANES**, did unlawfully, knowingly, intentionally and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Distribution of Fentanyl)

On or about February 20, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **MORGAN JANES**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II narcotic controlled substance, in exchange for \$50.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVENTEEN

(Distribution of Cocaine Base)

On or about March 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **KELSEY MCCLUNG**, did unlawfully, knowingly, intentionally and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for \$275.00 in United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

(Aiding and Abetting the Maintaining Drug-Involved Premises)

In the Spring of 2020, in Morgantown, Monongalia County, in the Northern District of West Virginia, the defendants, **JOHNNIE BRADLEY and NARKEVIA LEWIS**, aided and abetted by each other, did manage and control a place located at Southeast Court, Apartment 9, Morgantown, West Virginia, whether permanently or temporarily, as lessee and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully storing, distributing and using controlled substances, that is methamphetamine, cocaine base, also known as “crack,”, and fentanyl, all Schedule II narcotic controlled substances and heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

COUNT NINETEEN

(Aiding and Abetting the Maintaining Drug-Involved Premises)

From on or about April 13, 2020, and continuing until June 15, 2020, in Star City, Monongalia County, in the Northern District of West Virginia, the defendants, **ANTHONY ALLEN and AALIYAH SNOWDEN**, aided and abetted by each other, did manage and control a place located at 260 Wayland Street, Apartment 103, Star City, West Virginia, whether permanently or temporarily, as lessee and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully storing, distributing and using a controlled substance, that is methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

COUNT TWENTY

(Distribution of Methamphetamine)

On or about April 18, 2020, at approximately 7:46 p.m., in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY ALLEN**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Unlawful Use of Communication Facility)

On or about April 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and TIFFANY GROVES**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT TWENTY-TWO

(Aiding and Abetting Possession with Intent to Distribute Methamphetamine)

On or about April 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **TIFFANY GROVES and DAVID GAMBLE**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

(Distribution of Methamphetamine)

On or about April 18, 2020, at approximately 9:22 p.m., in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY ALLEN**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

(Unlawful Use of Communication Facility)

On or about April 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and ROBERT WOODY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT TWENTY-FIVE

(Possession with Intent to Distribute Methamphetamine)

On or about April 18, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **ROBERT WOODY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SIX

(Aiding and Abetting the Maintaining Drug-Involved Premises)

In the Spring of 2020, in Morgantown, Monongalia County, in the Northern District of West Virginia, the defendants, **GREG SNIDER and KELSEY MCCLUNG**, aided and abetted by each other, did manage and control a place located at 345 Chestnut Street, Morgantown, West Virginia, whether permanently or temporarily, as lessee and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully storing, distributing and using controlled substances, that is methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2

COUNT TWENTY-SEVEN

(Unlawful Use of Communication Facility)

On or about April 19, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and ASHLEY JOHNSON**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT TWENTY-EIGHT

(Aiding and Abetting Distribution of Methamphetamine)

On or about April 19, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN**, aided and abetted by another person, did unlawfully, knowingly, intentionally, and without authority distribute methamphetamine,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE

(Possession with Intent to Distribute Methamphetamine)

On or about April 19, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **ROBERT WOODY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY

(Unlawful Use of Communication Facility)

On or about April 19, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and ROBERT WOODY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT THIRTY-ONE

(Aiding and Abetting the Distribution of Heroin within 1000 feet of a Protected Location)

On or about April 22, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and LEONARD JASMINE**, aided and abetted by each other, did unlawfully, knowingly, intentionally and without authority distribute within 1000 feet of property belonging to West Virginia University, a public university, a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 860, and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO

(Unlawful Use of Communication Facility)

On or about April 22, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and SUZANNE ADIYEH**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1)

COUNT THIRTY-THREE

(Possession with Intent to Distribute Methamphetamine)

On or about April 23, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **JOHNNIE BRADLEY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FOUR

(Possession with Intent to Distribute Methamphetamine)

On or about April 23, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **MICHAEL ALCENDOR**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FIVE

(Unlawful Use of Communication Facility)

On or about April 23, 2020, in Monongalia County, in the Northern District of West Virginia and elsewhere, defendants **ANTHONY ALLEN and FRANCISCO CHANES**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT THIRTY-SIX

(Aiding and Abetting the Maintaining Drug-Involved Premises)

From on or about May 10, 2020, and continuing until June 15, 2020, in Morgantown, Monongalia County, in the Northern District of West Virginia, the defendants, **ANTHONY ALLEN and SKILOR PERDUE**, aided and abetted by each other, did manage and control a place located at 732 Monongalia Avenue, Apartment A, Morgantown, West Virginia, whether permanently or temporarily, as lessee and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully storing, distributing and using controlled substances, that is fentanyl, a Schedule II narcotic controlled substance, and heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

COUNT THIRTY-SEVEN

(Aiding and Abetting the Maintaining Drug-Involved Premises)

From on or about May 10, 2020, and continuing until May 12, 2020, in Monongalia County, in the Northern District of West Virginia, the defendants, **ANTHONY ALLEN and SUZANNE ADIYEH**, aided and abetted by each other, did manage and control a place located at 1046 Willowdale Road, Room 203, Morgantown, West Virginia, whether permanently or temporarily, as lessee and occupant, and did knowingly and intentionally make available for use said place for the purpose of unlawfully storing, distributing and using controlled substances, that is cocaine base, also known as “crack,” cocaine hydrochloride, also known as “coke,” both Schedule II narcotic controlled substances, and heroin, a Schedule I narcotic controlled substance; in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

COUNT THIRTY-EIGHT

(Unlawful Use of Communication Facility)

On or about May 11, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN** and **TIFFANY GROVES**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT THIRTY-NINE

(Distribution of Cocaine Base)

On or about May 11, 2020, at approximately 6:59 p.m., in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY ALLEN**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY

(Distribution of Heroin)

On or about May 11, 2020, at approximately 5:37 p.m., in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY ALLEN**, did unlawfully, knowingly, intentionally and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-ONE

(Unlawful Use of Communication Facility)

On or about May 11, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and LOREN DELANEY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FORTY-TWO

(Possession with Intent to Distribute Cocaine Base)

On or about May 11, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **LOREN DELANEY**, did unlawfully, knowingly, intentionally and without authority possession with intent to distribute, a mixture and substance containing a detectable amount of cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-THREE

(Unlawful Use of Communication Facility)

On or about May 11, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and SABRINA BURTON**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FORTY-FOUR

(Aiding and Abetting Distribution of Heroin)

On or about May 12, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and SKILOR PERDUE**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FORTY-FIVE

(Unlawful Use of Communication Facility)

On or about May 12, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and SABRINA BURTON**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FORTY-SIX

(Possession with Intent to Distribute Heroin)

On or about May 12, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **SABRINA BURTON**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-SEVEN

(Distribution of Cocaine Base)

On or about May 13, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **ANTHONY ALLEN**, did unlawfully, knowingly, intentionally and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-EIGHT

(Unlawful Use of Communication Facility)

On or about May 13, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and LOREN DELANEY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FORTY-NINE

(Possession with Intent to Distribute Cocaine Base)

On or about May 13, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **LOREN DELANEY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTY

(Aiding and Abetting Distribution of Cocaine Base)

On or about May 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and SKILOR PERDUE**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTY-ONE

(Unlawful Use of Communication Facility)

On or about May 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and LOREN DELANEY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FIFTY-TWO

(Possession with Intent to Distribute Cocaine Base)

On or about May 14, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **LOREN DELANEY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute cocaine base, also known as, “crack,” a Schedule II narcotic controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTY-THREE

(Unlawful Use of Communication Facility)

On or about May 15, 2020, in Monongalia County, in the Northern District of West Virginia and elsewhere, defendants **ANTHONY ALLEN and SIXTO MARQUEZ**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1)

COUNT FIFTY-FOUR

(Unlawful Use of Communication Facility)

On or about June 5, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and RODERICK BRADLEY**, did unlawfully, knowingly and intentionally use a communication facility, that is a telephone system in committing, causing and facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1) and 846, as alleged in Count One of this Indictment, that is the distribution and conspiracy to distribute a controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d)(1).

COUNT FIFTY-FIVE

(Aiding and Abetting Distribution of Cocaine Base)

On or about June 5, 2020, in Monongalia County, in the Northern District of West Virginia, defendants **ANTHONY ALLEN and RODERICK BRADLEY**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTY-SIX

(Possession with Intent to Distribute Cocaine Base)

On or about June 5, 2020, in Monongalia County, in the Northern District of West Virginia, defendant **LOREN DELANEY**, did unlawfully, knowingly, intentionally and without authority possess with intent to distribute cocaine base, also known as “crack,” a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Section 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense.

A true bill,

/s/ _____
Grand Jury Foreperson

/s/ _____
WILLIAM J. POWELL
United States Attorney

Zelda E. Wesley
Assistant United States Attorney

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

OCT 20 2020

UNITED STATES OF AMERICA,

U.S. DISTRICT COURT
ELKINS WV 26241

v.

Criminal No. 1:20cr74

ANTHONY ALLEN ET AL,

Defendant.

ORDER TO SEAL

On the 20th day of October, 2020, came the United States of America and William J. Powell, United States Attorney for the Northern District of West Virginia, by Zelda E. Wesley Assistant United States Attorney for said district, and moved the Court to seal this matter for the reason that lack of sealing would compromise the integrity of an ongoing investigation. It appearing that the interests of justice will be served, it is accordingly:

ORDERED that the Clerk of Court **seal this matter, including all documents and proceedings;**

ORDERED that the Clerk of Court shall **automatically unseal** and place among the public records the above-styled criminal action **upon the arrest of any defendant on the charges listed in the indictment;**

Notwithstanding this Order to Seal, the clerk is **FURTHER ORDERED** to send an electronic copy of the sealed Indictment to the United States Attorney's Office and the United States Marshals Service.

DATED:

10.20.2020


UNITED STATES MAGISTRATE JUDGE

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Northern District of West Virginia

United States of America
v.

Case No. 1:20cr74 (5)

Jeffrey Howard

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) Jeffrey Howard

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

- Count 1 - Conspiracy to Distribute Controlled Substance
 Count 3 - Possession with Intent to Distribute Heroin
 Count 4 - Possession with Intent to Distribute Cocaine Base
 Count 5 - Possession with Intent to Distribute Methamphetamine

Date: 10/20/2020City and state: Elkins WV


Issuing officer's signature

Michael J. Alor, US Magistrate Judge

Printed name and title

Return

 This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Northern District of West Virginia

United States of America

v.

Case No. 1:20cr74 (6)

Kedrick Howard

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Kedrick Howard

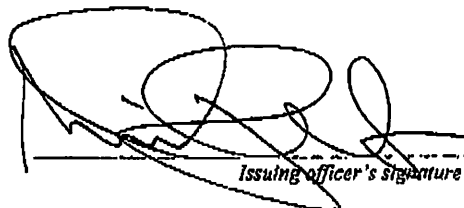
who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count 1 - Conspiracy to Distribute Controlled Substance

Date: 10/20/2020



Issuing officer's signature

City and state: Elkins WV

Michael J. Aloj, US Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Northern District of West Virginia

United States of America

v.

Case No. 1:20-cr-74 (7)

Leonard Jasmine

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Leonard Jasmine

who is accused of an offense or violation based on the following document filed with the court:

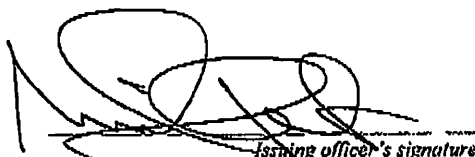
- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count 1 - Conspiracy to Distribute Controlled Substance

Count 31 - Aiding and Abetting Distribution of Heroin within 1000 feet of a Protected Location

Date: 10/20/2020


 Issuing officer's signature

City and state: Elkins WV

Michael J. Aloj, US Magistrate Judge

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
Northern District of West VirginiaUnited States of America
v.

Case No. 1:20cr74 (11)

Roderick Bradley

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
(name of person to be arrested) Roderick Bradley
who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Count 1 - Conspiracy to Distribute Controlled Substance
Count 54 - Unlawful Use of Communication Facility
Count 55 - Aiding and Abetting Distribution of Cocaine Base

Date: 10/20/2020
Issuing officer's signatureCity and state: Elkins WVMichael J. Alor US Magistrate Judge
Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title